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February 22, 2022

Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, New York 10007

Re: *Doe v. New York University*, 1:20-cv-01343-GHW

Dear Judge Woods:

We represent Plaintiff John Doe in the referenced matter and write to request a limited extension of the current fact discovery deadline to complete the depositions of two non-party witnesses. The current fact discovery deadline is March 1, 2022. Counsel for Defendant will be representing the non-party witnesses, who are former employees of Defendant, for the purposes of their depositions. Due to scheduling conflicts, the depositions of the two former NYU employees – Leah Lattimore and Christopher Bledsoe – will not be able to be completed before the current fact discovery deadline. Accordingly, Plaintiff requests an extension of time until March 15, 2022 to complete the depositions of Ms. Lattimore and Mr. Bledsoe. Plaintiff is not seeking an extension of time to complete any other fact discovery in this matter, nor is he seeking any changes to any other discovery deadlines in this matter. Defendant does not object to Plaintiff's request.

The Court previously granted the parties' application to extend the deadlines for discovery in this matter by its Text Only Order dated November 2, 2021 (ECF 59). This is the first time that Plaintiff has requested an extension of time for the limited purpose of deposing Ms. Lattimore and Mr. Bledsoe.

Your Honor's attention to this matter is greatly appreciated.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kimberly C. Lau", written over a faint, light blue circular stamp.

Kimberly C. Lau

cc: Jeffrey P. Metzler
Max A. Winograd
Melissa Pettit